

1 CAITLIN H. RAILO

2 account?

3 A. I don't remember.

4 Q. Who did you speak to?

5 A. One of the ladies in the office.

6 Q. Do you know who it was?

7 A. No, I don't remember her name.

8 Q. What did you say and what did she
9 say?

10 A. "I don't feel good. I don't think
11 I should be in work today." I said, "Is there
12 any way I could stay home?"

13 Q. And what did she say?

14 A. "No, there is absolutely no one to
15 do your run. You have to come in."

16 Q. What did you say?

17 A. What could I say? I went in.

18 Q. When you went in, who was in the
19 office? Do you recall?

20 A. Same, same two ladies that are in
21 the office.

22 Q. Both of them were in the office?

23 A. I believe so. I don't really
24 remember.

25 Q. Were you ever told that day that

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you would be fired if you didn't come in?

A. I was told prior to that day.

Q. The day of the accident, were you told you would be fired if you didn't come in?

A. No. I hung up and went in.

Q. Before that, were you ever told that you would be fired if you didn't come into work?

A. Yes, I would lose my job.

Q. And who told you that?

A. I had to sign a paper, and then the boss told me. They both told me.

Q. What paper did you have to sign?

A. One of their papers saying that I wouldn't be late or call out again.

Q. What happened on that occasion --

A. I don't remember.

Q. -- that caused you to have to sign something?

A. Either I was late or called out. I don't remember the day.

Q. And do you remember in relation to the accident when it was?

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Q. Days? Weeks? Months?

A. No.

Q. Who did you speak to?

A. I always speak to the same person.
It's one of them in the office, I don't remember
who, when I called out prior or that day.

Q. Prior?

A. I don't remember.

Q. You don't remember? Was it a
female or a male?

A. It was female. They're both
females in the office.

Q. So, someone in the office that told
you you would lose your job if you came in late
or didn't come in to work again?

A. They told me, and then my boss told
me.

Q. So, was that over the phone, was it
in person where the female told you you would
lose your job?

A. That person I had to sign a paper.

Q. Do you know what the paper stated?

A. That if I called out or was late
again, that I would be -- I don't remember what

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it said on the paper, but basically I would lose my job.

Q. Did you sign it?

A. Yes.

Q. And was there another discussion about this with someone at Quality Bus?

A. My boss.

Q. Okay. Who was that?

A. I don't know his name. What's his name?

Q. Male?

A. Yes.

Q. And what did he say? What did you say?

A. Same thing.

Q. What did he say?

A. That I cannot be late or call out again.

Q. And what did you say?

A. I signed the paper.

Q. Well, did he present the paper or did the female?

A. Both of them.

Q. Two separate papers?

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A. I don't know. I don't remember.

It was the same paper, but there is two different copies. They both had a copy.

Q. Who handed it to you?

A. I signed it with her, I believe.

Q. And did your boss tell you anything else --

A. No.

Q. -- about that?

A. No.

Q. Were you certified by the State of New York to drive a school bus --

A. Yes.

Q. -- on the date of the accident?

A. Yes.

MR. CATALINOTTO: I don't have any other questions. Thanks.

FURTHER EXAMINATION

BY MR. CIMINI:

Q. Caitlin, you remember me?

A. Yes.

Q. I'm Vince Cimini. I represent Justin Maher. I just have some follow-up questions based on some of the questioning that

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Attorney Catalinotto asked you, and certainly I'm not even going to be remotely close as to how long I was last time we were here.

Let me ask you this, Caitlin: Did you have a belief that if you missed going into work on the date of the accident, February 14th, 2013, that you were going to lose your job?

A. Yes.

Q. And was that based on some prior conversations that you had with your boss and with some other female employees in the office --

A. Yes.

Q. -- specifically told you that if you miss work, you're going to be fired?

A. Yes.

Q. And you believed that?

A. Yes.

Q. And isn't it true that you also believed that you should not have gone into work on the day of February 14th, 2013?

MR. CATALINOTTO: Objection to the form. You can answer.

A. Yes.

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Q. Your answer was yes?

A. Yes.

Q. And isn't that because you knew that you had taken some pills and that you were really not feeling well, that you were in pain and that you were very tired?

MR. CATALINOTTO: Objection to the form.

A. It wasn't the fact so much that I was tired, it was the fact that I was in pain and that I shouldn't have to work like that.

Q. Because that pain would affect your ability to drive, wouldn't it?

MR. CATALINOTTO: Objection to the form.

MR. LaROSE: Objection.

MR. CATALINOTTO: I don't believe -- go ahead, you can answer.

MR. CIMINI: Go ahead, you can answer.

MR. LaROSE: Read it back for her so she hears the whole thing without the objections.

(Whereupon, the last question was

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2 read back by the reporter.)

3 MR. CATALINOTTO: Objection.

4 A. It's not the pain that would affect
5 my ability to drive, because -- you know what, I
6 really don't know how to answer that because --

7 Q. Well, then why did you feel it was
8 necessary to call in and attempt to not go to
9 work that morning?

10 A. Because of the pain.

11 Q. And you knew that you had to drive
12 a bus that day; correct?

13 A. Yes.

14 Q. And you didn't want to go into work
15 and drive a bus, did you?

16 MR. CATALINOTTO: Objection to the
17 form. You can answer.

18 A. No.

19 Q. And that was because you're saying
20 you were in pain?

21 A. Yes.

22 Q. When you were shown the typed
23 statement that you gave as part of Exhibit J,
24 when you were interviewed by the police, were
25 you being truthful when you answered the police

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officer's questions?

A. Honestly, that day where they came and got me, they didn't do that until after about five hours and I don't really like that whole typed -- I don't like any of the answers to those questions, because they were -- I don't know, they kind of rushed me on that.

Q. Do you remember being asked the following question on April 12th, 2013 by Investigator Tim Diamond: Question is --

MR. LaROSE: Off the record.

(Discussion off the record.)

Q. I'll ask the question again.
Do you remember being asked the following question on April 12th, 2013 in the presence of a police investigator: The question is, "Did you feel like you should not have gone to work and drive the school bus?" And the typed answer is, "I felt fine in the morning run. I just felt tired in the afternoon." Is that an accurate answer to the question?

MR. LaROSE: Is that what you said?

MR. CIMINI: Well, that's a different way of saying is that an

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2 accurate answer.

3 Q. But do you recall if that's what
4 you said and that's how you answered the
5 question?

6 A. That might have been what I said to
7 him, yes, but that's only probably one of the
8 sentences with the answer.

9 Q. And you're right. The following
10 sentence says, "The pill combined with lack of
11 sleep from the night before caused me to be more
12 tired than normal."

13 A. No, I didn't say that.

14 Q. You didn't say that?

15 A. Because I would have been more
16 tired in the morning run than the afternoon run.

17 Q. Do you have any idea as to why the
18 investigator who took the statement would type
19 the answer that way if that's not what you said?

20 A. That's why I'm saying, I don't like
21 that whole statement because we were just having
22 conversations about all kinds of drugs and pills
23 and we started going off on this. He was going
24 off on this other tangent about drug dealers and
25 pills, and it was that whole statement is

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just -- I don't know, typed by the police, but, I mean, I was -- I was tired. I mean, my body was tired and I tried calling out that morning and they just -- I don't know. I mean, yeah, I was a little tired, but not too tired not to drive, but the majority of it was the pain. It was very uncomfortable, very uncomfortable.

Q. And because of that uncomfortable-ness that you were feeling due to the pain, you didn't want to go into work and drive a bus that day, did you?

MR. CATALINOTTO: Objection to the form. You can answer.

A. No.

Q. Now, you were shown by Attorney Catalinotto two exhibits, G and H. I'll show you from the original exhibit book.

(Documents submitted.)

Q. Do you remember these two forms, G and H?

A. Yes.

Q. They contain information that's typed on there that you did not type?

A. No.

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2 Q. At least on Exhibit G there is
3 typed information; correct?

4 A. Yes.

5 Q. You didn't type any of that
6 information, did you?

7 A. No.

8 Q. But your signature appears on the
9 bottom; correct?

10 A. Yes.

11 Q. Is it possible, Caitlin, that you
12 signed that form without there being any
13 information on the form when you signed it?

14 A. It's possible.

15 MR. CATALINOTTO: Objection to the
16 form.

17 A. I don't remember any of that,
18 because I would have noticed because this is all
19 blank, the convictions are on here, they're
20 blank and accident information and conviction
21 information are not right.

22 MR. LaROSE: That's now on H you're
23 looking at?

24 THE WITNESS: No. Both of them,
25 convictions on the bottom of that one and

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2 accidents, they're on both of them.

3 Q. In your application you
4 acknowledged some convictions and some
5 accidents; correct?

6 A. Absolutely.

7 Q. And on these forms they don't
8 appear, do they?

9 A. No.

10 Q. You didn't fill out the information
11 on those forms, G and H, did you?

12 A. No.

13 Q. And that's my question. Do you
14 believe it's possible that someone from Quality
15 Bus handed you these forms and said, here, would
16 you just sign these --

17 MR. CATALINOTTO: Objection.

18 Q. -- with them being blank?

19 MR. LaROSE: He means completely
20 blank.

21 THE WITNESS: Yes.

22 Q. Do you believe that's possibly what
23 happened?

24 A. Yes.

25 MR. CATALINOTTO: Objection to the

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form.

A. Anything is possible. I don't understand it.

Q. Now, you were also asked some questions about prior drug rehabilitation. I think you said that prior to the accident it was six or seven years before that you had any drug or alcohol rehabilitation; is that correct?

A. Yes.

Q. And just so I'm clear, was the rehabilitation that you had for drugs and alcohol or just drugs?

A. Just drugs.

Q. What kind of drugs?

A. The time before, I think it was -- it was heroin.

Q. Anything else?

A. No.

Q. Was that rehabilitation for heroin, that type of treatment, was that inpatient treatment or were you home and just attending counseling?

A. Inpatient.

Q. Do you know for how long?

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A. Actually, I think the last time was Daytop. That was a year. Eight months, almost a year.

Q. A year of rehab inpatient?

A. Yes.

Q. Where is Daytop?

A. Rhinebeck.

Q. You believe that that was six or seven years before the accident?

A. Yes.

Q. And that was for heroin?

A. Yes.

Q. How about any inpatient rehab prior to Daytop, do you recall undergoing any inpatient treatment?

A. Recovery center in Monticello and Catskill Regional Center.

Q. Is that one place or two places?

A. That's two separate places.

Q. Okay. And they were both inpatient treatment?

A. Yes.

Q. And for drugs and alcohol or just drugs?

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2 A. And/or alcohol. They're all for me
3 drugs.

4 MR. LaROSE: For you, not what the
5 program allows.

6 Q. For you, yeah, just drugs?

7 A. Yes.

8 Q. And do you remember what drugs
9 caused you to be in those two facilities?

10 A. Heroin.

11 Q. Was it always heroin?

12 A. Yes.

13 Q. When were you in those two other
14 facilities, roughly?

15 MR. LaROSE: Either by your age or
16 anything else you can tell us.

17 A. I know that Monticello was right
18 before Daytop, so it was about the same year.
19 And Catskill, I don't remember. Probably within
20 a year before that.

21 Q. How long was the Monticello rehab?

22 A. I was in there for a month and then
23 went to Daytop.

24 Q. You already said you were in Daytop
25 for eight months?

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2 A. Yeah, for around a year, so, yeah,
3 I think it was around eight months.

4 Q. How long were you in Catskill?

5 A. A couple weeks. That's more of
6 a -- it's a hospital, so it's more of a detox.
7 You do your outpatient when you leave.

8 Q. You were also asked some questions
9 about what you pled guilty to as a result of the
10 February 14th, 2013 accident?

11 A. Yes.

12 Q. Do you -- as you sit here today, do
13 you have a specific recollection as to exactly
14 what you pled guilty to?

15 A. No.

16 Q. When you were arrested as a result
17 of this accident, do you remember being charged
18 with fourteen different counts?

19 A. Fourteen? No, but I know there was
20 a lot.

21 Q. You don't remember the specific
22 number?

23 A. No.

24 Q. But you do remember pleading guilty
25 to two separate counts; correct?

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A. Yes.

Q. And I think you said one was assault?

A. Yes.

Q. Would it be correct that you pled guilty to Vehicular Assault in the Second Degree?

A. Yes.

Q. When you pled guilty to that charge, did you have to appear before a judge in court?

A. Yes.

Q. And do you remember, when you appeared before that judge in court, do you remember the judge asking you questions about whether you know what you're doing and whether you did, in fact, commit the crime of Vehicular Assault in the Second Degree?

A. I -- mostly it was my lawyer talking and then I just pled guilty to the charges, because, I mean, I knew it was -- I was going to get charged, so I just took the first plea because it was that whole accident just kind of freaked me out, so I just took the first

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charge.

Q. That's really not my question, I'm sorry, and I'll try to be clear with the question.

When you pled guilty to the Vehicular Assault in the Second Degree, you were standing before a judge; correct?

A. Yes.

Q. And you had your lawyer with you; correct?

A. Yes.

Q. And do you remember your lawyer asking you a series of questions at that time as to whether or not you understand what you're doing in court there that day? Do you remember him asking you questions like that?

A. No.

Q. You don't, okay.

But you did agree to plead guilty to Vehicular Assault in the Second Degree?

A. Yes.

Q. And do you remember what the facts were that supported that actual offense that you pled guilty to?

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A. No.

Q. Do you remember if the judge asked you, "Do you agree that you caused serious physical injury to Justin Maher and that you did operate a motor vehicle in violation of Subdivision 4 of Section 1192 of the Vehicle and Traffic Law in that you operated a motor vehicle while your ability was so impaired by the use of a drug as defined in the Vehicle and Traffic Law of the State of New York, to wit, Diazepam and morphine, and as a result of such impairment by the use of such drug you did operate such motor vehicle in a manner that caused serious physical injury to such other person"?

A. In court, no, I don't remember that.

Q. You don't remember that?

A. No.

MR. CATALINOTTO: Can you just tell us what you're referring to?

MR. CIMINI: Sure. It's Page 136 of Exhibit --

MR. CATALINOTTO: I think it's the indictment.

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MR. CIMINI: It's the indictment
that lists --

MR. CATALINOTTO: But it's not an
on-the-record discussion. I just want to
make sure.

MR. CIMINI: No, you're right. I
don't have that either, no.

MR. CATALINOTTO: Okay, thanks.

MR. CIMINI: You're right.

Q. The other charge that you pled
guilty to you said was a DWI involving a minor
or a child. Do you recall that?

A. I know it was endangering --
endangering the welfare of a minor, I think.

Q. There is three charges altogether,
aggravated operating a motor vehicle while under
the influence of drugs while a child who was
fifteen years of age or less was a passenger in
such motor vehicle. Does that sound right?

A. For the exact charge?

Q. Yes, that you pled guilty to.

A. That doesn't sound like it -- yes.
I mean, yes, okay.

Q. Do you remember the judge asking

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you any questions about whether you did, in fact, commit that crime and that you were pleading guilty to that specific offense?

A. All I remember him asking me was if I was pleading guilty to those charges.

Q. And what did you say in response to that, if you recall?

A. I said, "Yes, I'm pleading guilty."

Q. To both charges?

A. Yes.

Q. And you had a lawyer with you at that time; right?

A. Yes.

Q. Who was the lawyer, do you recall?

A. I don't remember her name, no.

Q. It was a female?

A. Yes.

Q. You didn't hire her personally, did you?

A. No.

Q. She was a Public Defender?

A. Yes.

Q. Was that the only lawyer that you ever had represent you for this accident, for

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the charges --

A. Yes.

Q. -- that were related to the
accident?

A. I hired one when I got arrested
that I got bailed out on, and then he said that
it was going to trial and he couldn't be a
lawyer for trial, but, yes, she was the only one
at Goshen.

Q. And the last time I showed you Page
110 of one of our exhibits, part of C?

(Document submitted.)

MR. FOULKE: Page 110.

MR. LaROSE: Just let him ask the
question.

A. I don't know what this is.

Q. You're looking at Page 110 of
Exhibit C; right?

A. Yes.

Q. Is there any writing on this
particular page that is yours ?

A. No.

Q. Nothing at all?

A. No.

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Q. And this was in response to your arrest on April 12th, 2013?

MR. LaROSE: Do you know that?

A. Oh, I see it on the date, but...

Q. That's the day you were arrested; correct?

A. Yes.

Q. And then there is defense counsel listed as Greenwald Law with the telephone number next to it; right?

A. Yes.

Q. Do you see that?

A. I don't know who that is.

Q. Do you know an attorney Erno Poll?

MR. FOULKE: P-O-L-L, Erno,
E-R-N-O.

A. No.

Q. Does that name sound at all -- familiar at all to you?

A. No.

Q. You were never represented by anybody that sounded close to that?

A. No.

Q. You said that you had an attorney

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with you when you were first arrested?

A. No, I didn't have one, not when I was getting questioned in the police, no.

Q. You remember when I asked you before, did you have an attorney representing you for those charges other than the female Public Defender, you said yes?

MR. LaROSE: She said yes when she got bail.

MR. CATALINOTTO: She was arraigned.

Q. Do you know who that lawyer was?

A. No. After I got bail?

MR. LaROSE: After we got bail.

A. We called Wolfe out of Walden, but that was the only one that would ever -- I don't know who that is.

MR. LaROSE: Off the record.

(Discussion off the record.)

Q. Now, you had a DWAI in the past some -- perhaps in 2005 that you were asked about; correct?

A. Yes.

Q. And you said that you were not

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driving the car at that arrest?

A. No.

Q. Correct, that you were in the car?

A. Yes.

Q. Where were you seated in the car?

In the driver's seat?

A. Yes.

Q. And the keys were in the ignition?

A. Yes.

Q. Was the car running or was the car off?

A. The car was off. I had overdosed in the car.

Q. On heroin?

A. Yes.

Q. Did this overdose prompt you to go into one of those rehabs that you mentioned earlier?

A. I think I did jail time.

Q. How about after, immediately after the jail time, did you go into rehab as a result of that arrest and that jail time?

A. I don't remember.

Q. At the time you applied for

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employment with Quality Bus, your primary care physician was a Dr. Galli; correct?

A. Yes.

Q. Did you ever have Dr. Galli sign any kind of letter or form that indicated that you were okay and fit to drive a bus?

A. Yes.

Q. You did give Dr. Galli an actual form?

A. They faxed it to her and then she faxed it back after she signed it.

Q. Did you ever see that form?

A. No.

Q. Do you know what that form said?

A. No. Just the medications that I was on and that she signed off on it for me to drive.

Q. How do you know that Dr. Galli signed off on the particular form that was submitted to her?

A. I didn't physically see her see it, but she said that my job had called her or Partners in Safety had called her and they couldn't give me -- I couldn't drive unless she

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2 signed off on it.

3 Q. And that was my next question. My
4 question was, do you know who it was that
5 contacted Dr. Galli's office?

6 A. It was either Partners in Safety or
7 the job itself. I think it was Partners in
8 Safety.

9 Q. When you say "the job itself," do
10 you mean Quality Bus?

11 A. Yes.

12 Q. As you sit here today, do you know,
13 in fact, who it was --

14 A. No.

15 Q. -- for sure? Okay.

16 A. No.

17 Q. Did you have a discussion with Dr.
18 Galli about the form that was submitted to her?

19 A. She told me that they had requested
20 it and she was going to do it that day after I
21 saw her in her office.

22 Q. Did she tell you what she was going
23 to write on the form?

24 A. She just said that she had to sign
25 off on my medications, that I could drive with

1 CAITLIN H. RAILO

2 the medication that I was on.

3 Q. And do you remember when you had
4 this discussion with Dr. Galli?

5 A. I don't remember the day, no, but
6 it might have been a day or two after I went to
7 Partners in Safety. I'm not sure.

8 Q. Did she tell you what medications
9 she signed off on specifically?

10 A. She prescribes me all of them.

11 Q. Which ones does she prescribe?

12 A. Suboxone, the Valium and Clonidine.
13 All my medications come from her.

14 Q. Percocet?

15 A. No, no. That one is Middletown
16 Crystal Run.

17 Q. Does Dr. Galli prescribe you any
18 other medications than the ones you just
19 described?

20 A. No.

21 Q. You mentioned a woman by the name
22 of Mary who participated in some of your road
23 testing, correct --

24 A. Yes.

25 Q. -- for the bus company?

1 CAITLIN H. RAILO

2 A. Yes.

3 Q. Did Mary work directly for Quality
4 Bus as far as you know?

5 A. Yes.

6 Q. What was Mary's last name?

7 A. I don't know.

8 Q. Was that the woman that was
9 mentioned, Mary Koselnak?

10 A. Yes.

11 Q. That's the same Mary?

12 A. Yes.

13 Q. There is only one Mary?

14 A. Um-hum, yes.

15 Q. Okay. Do you know what her title
16 is?

17 A. No.

18 Q. Do you know if she was a manager?

19 A. No, I don't know.

20 Q. Do you know if she was -- you don't
21 know if she was an owner?

22 A. No.

23 Q. I think you said that you started
24 driving a bus on the first day that your
25 commercial driver's license was issued to you on

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CAITLIN H. RAILO

October 24th, 2012; is that accurate?

A. Yes.

Q. So, that very day you got the keys
to a bus?

A. Yes.

Q. And did you actually do a route
that day?

A. Yes.

Q. You picked up school children?

A. Yes.

Q. Did anybody from Quality Bus ride
with you on that first day?

A. No.

Q. How about any day that you were
driving school students for Quality Bus, did
Quality Bus employ, supervise or manage your --
or even another bus driver, ride with you at any
point in time?

A. No.

MR. CIMINI: I think that's all I
have.

MR. CATALINOTTO: I just have a few
follow-up questions.

FURTHER EXAMINATION

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CAITLIN H. RAILO

BY MR. CATALINOTTO:

Q. When you went home after the morning run on the day of the accident, what did you do?

A. Took a nap, watched TV, took a nap, ate.

Q. How long did you nap for?

A. About two and a half hours.

Q. When you drove that bus at the time of the accident, did you feel your ability was impaired to operate a bus?

A. No.

Q. I just wanted to go back to this form, the medical examination report, Exhibit F.

A. Yes.

Q. Was it your understanding that the nurse took Dr. Galli's name and number and was going to request clearance for you from Dr. Galli for the medications you were on?

A. She gave me a card that day.

Q. What did the card say?

A. That I was cleared to drive with the medication.

Q. Dr. Galli did?

1 CAITLIN H. RAILO

2 A. No. She did.

3 Q. The nurse had it from Dr. Galli?

4 A. No. The nurse gave me a card that
5 day to leave with. It was a little white card
6 that you carry in your wallet. So maybe she did
7 fax her that day, I'm not sure.

8 Q. On the right side over here, is
9 that the nurse's handwriting (indicating)?

10 A. Yes. All of that is.

11 Q. And the name, "Dr. Galli," it says
12 "PCP," that would be primary care physician --

13 A. Yes.

14 Q. -- is that the nurse's handwriting?

15 A. Yes.

16 Q. And the phone number underneath?

17 A. Yes.

18 Q. All right. So, the nurse could
19 have gotten in contact with Dr. Galli that day
20 to get the clearance that day while you were
21 still there?

22 A. Yes.

23 Q. And you left with that card?

24 A. Yes.

25 Q. So, is it fair to say that the

1 CAITLIN H. RAILO

2 request came from the Article 19-A medical
3 examiner --

4 A. Yes.

5 Q. -- for the clearance on the
6 medication?

7 A. Yes.

8 Q. Just so I'm clear, did Dr. Galli
9 prescribe all those meds for you or was there
10 another doctor in the mix? The meds I'm talking
11 about are the Diazepam and the Clonidine.

12 A. And the Suboxone and the Ambien all
13 came from Dr. Galli.

14 Q. From Dr. Galli?

15 A. Yes.

16 Q. You were asked about someone being
17 on the bus with you when you drove the route,
18 Quality Bus.

19 A. Yes.

20 Q. Were you aware that they also, in
21 addition to the training that you got, once you
22 were driving the route, that Mary would follow
23 you sometimes while you were in the bus?

24 A. Yes. I heard about that two or
25 three times, she told me.

1 CAITLIN H. RAILO

2 Q. And that was when you were picking
3 up children, dropping off children, going to
4 schools; correct?

5 A. Yes.

6 Q. The DWI or DWAI what we were
7 talking about in 2005, is it fair to say that
8 you never wrote that down on any application for
9 employment on Quality Bus?

10 A. They only asked for the past three
11 years.

12 Q. So, you didn't put that down?

13 A. No. More than three years ago.

14 MR. CATALINOTTO: All right. I
15 don't have any other questions. Thanks.

16 FURTHER EXAMINATION

17 BY MR. CIMINI:

18 Q. Did you know Mary was following you
19 on the occasion she was following you?

20 A. No. I'm sorry. No.

21 MR. CIMINI: Okay.

22 MR. FOULKE: Do you mind if I ask a
23 few questions?

24 Can we mark this?

25 MR. CATALINOTTO: You're going to

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CAITLIN H. RAILO

mark the indictment?

MR. FOULKE: Part of it, Page 110.

MR. LaROSE: You're beating a dead horse.

MR. CATALINOTTO: She didn't prepare it.

MR. LaROSE: She doesn't know exactly what language she pled to, Evan. I mean, what do you think you're going to accomplish?

MR. CATALINOTTO: Off the record.

(Discussion off the record.)

EXAMINATION BY

MR. FOULKE:

Q. Ms. Railo, I represent Justin Maher. Just a few questions for you.

I'm handing you what was Page 136 of what was a part of Exhibit C which was a multi-packet from the Criminal Court, and was your testimony earlier that you recall that you pled guilty to two separate charges; is that correct?

A. Yes.

Q. And one of those charges you

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CAITLIN H. RAILO

testified was Vehicular Assault in the Second Degree; is that right?

A. Yes.

Q. Now, prior to pleading to those charges, did you have an opportunity to review the indictment with your attorney?

A. No.

Q. Did you have an opportunity to discuss those charges with your attorney?

A. Vaguely, very quickly, not in length, in detail.

Q. Did you have an opportunity to meet with your attorney prior to appearing before Judge DeRosa?

A. Yes.

Q. Do you recall the date you appeared before Judge DeRosa?

A. The last time, it was March 17th.

Q. And do you recall -- that's March 17, 2014?

A. Yes.

Q. Now, do you recall the date you appeared before Judge DeRosa with your attorney when you entered your guilty plea?

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CAITLIN H. RAILO

A. No.

Q. Was it the same attorney that represented you on March 17th, 2014 that appeared with you at the time when you entered your guilty plea?

A. Yes.

Q. When you entered your guilty plea, was that 2014 or 2013?

A. '14.

Q. Approximately how much time elapsed from the time you entered your guilty plea until March 17th of 2014?

A. About a year.

Q. Now, at the time you appeared and entered your guilty plea to Vehicular Assault in the Second Degree, you had an understanding of what the charges were, did you not?

MR. CATALINOTTO: Objection to the form.

A. Yes.

Q. You understood, did you not, that at the time you entered that plea, that you were admitting responsibility for causing serious physical injury to Justin Maher; is that

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CAITLIN H. RAILO

correct?

MR. CATALINOTTO: Objection to the
form.

A. Yes.

Q. And you were admitting responsi-
bility that you operated a motor vehicle while
your ability to do so was impaired; is that
correct?

MR. CATALINOTTO: Objection to the
form.

A. Yes.

MR. LaROSE: Objection.

Q. And you're admitting at that time
when you entered that guilty plea that you
operated a motor vehicle while your ability to
do so was impaired and that caused physical
injury to Justin Maher?

MR. CATALINOTTO: Objection to the
form.

MR. LaROSE: Objection.

A. Yes.

MR. FOULKE: Thank you. Nothing
else.

FURTHER EXAMINATION

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CAITLIN H. RAILO

BY MR. CATALINOTTO:

Q. Ms. Railo, I'm going to ask you again, was your ability to operate a motor vehicle of any sort impaired at the time of this accident?

A. No.

MR. CATALINOTTO: Thank you.

MR. LaROSE: We're done.

(Time noted - 11:22 a.m.)

oOo

Caitlin H. Railo

Sworn to before me this

_____ day of _____, 2015.

Notary Public

INDEX TO TESTIMONY

<u>EXAMINATION BY</u>	<u>PAGE</u>
MR. CATALINOTTO	266, 378, 386
MR. CIMINI	352, 382
MR. FOULKE	383

oOo

RAILO EXHIBITS
MARKED FOR IDENTIFICATION

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
L	Photocopy of Caitlin H. Railo's CDL Driver License	269
M	School Bus Driver Physical Performance Test	277
N	Report of Annual Defensive Driving Performance for Driver Under Article 19-A	279
O	Article 19-A Biennial Behind The Wheel Road Test	280
P	Pre Service Course Quality Bus Service, LLC, four pages	282

<u>EXHIBIT</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
Q	School Bus Driver Pre Service Course Trainee Manual CORE Units	284
R	Quality Bus Company Employee Handbook	288
S	Sign-In log for the New York State Laws and Regs for School Bus Drivers	291
T	Photocopy of front page of Quality Bus Service Employee Handbook	293
U	Photocopy of "Article 19-A Oral/Written Examination Results"	294
V	Photocopy of "Request for New York State Fingerprinting Services Information Form"	295

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C E R T I F I C A T I O N

I, MELISSA SHELTON, a Shorthand Reporter and Notary Public within and for the State of New York, do hereby certify:

That the witness whose examination is hereinbefore set forth, was either first duly sworn or affirmed through me, and that the transcript of said examination is a true record of the testimony given by the said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and am in no way interested in the outcome of this matter.



MELISSA SHELTON

Dated: April 15, 2015

ERRATA SHEET

RE: MAHER VS. RAILO & QUALITY
BUS SERVICE, LLC.

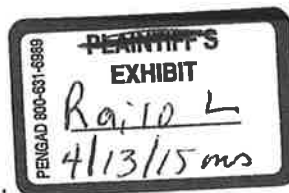
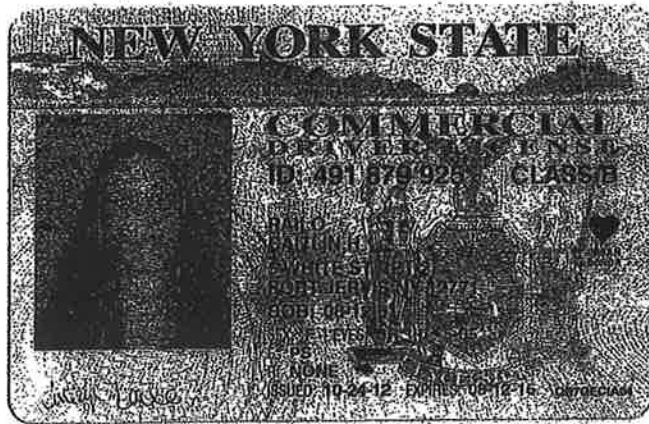
The following corrections, additions
or deletions were noted on the transcript of the
testimony which I gave in the above-captioned
matter.

<u>PAGE(S)</u>	<u>LINE(S)</u>	<u>SHOULD READ</u>	<u>REASON FOR CHANGE</u>
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____
* _____	* _____	* _____	* _____

Caitlin H. Railo

Sworn to before me this
_____ day of _____, 2015.

Notary Public



SCHOOL BUS DRIVER PHYSICAL PERFORMANCE TEST

DRIVER'S LAST NAME Railo		FIRST NAME Caitlin		MI H	DRIVER'S SIGNATURE <i>Caitlin Railo</i>	
STREET ADDRESS 5 White Street, Apartment 2					VEHICLE TYPE Large Bus	SCHOOL TYPE <input checked="" type="checkbox"/> PUBLIC <input type="checkbox"/> NON-PUBLIC
CITY Port Jervis	STATE NY	COUNTY Orange	ZIP CODE 12771		19-A CARRIER Quality Bus Service, LLC	
MOTORIST ID NUMBER 491879925		LICENSE CLASS/ENDORSEMENTS/RESTRICTIONS B PS NONE			TEST LOCATION 504 Route 42, Sparrowbush, NY 12780	

TESTER: SEE PT 901 FOR COMPLETE GUIDELINES FOR THIS TEST. CIRCLE "PASS" OR "FAIL" FOR EACH STANDARD. STOP THE TEST IMMEDIATELY IF ANY ITEM IS FAILED. ENTER TIME FOR TIMED STANDARDS. IF A TIMED TEST IS NOT COMPLETED, ENTER "DNC" (DID NOT COMPLETE).

STANDARD #1	BUS STEPS	TIME: 10.61	(3 TRIPS UP & DOWN IN 30 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #2	THROTTLE TO BRAKE	TIME: 6.03	(10 THROTTLE TO BRAKE CYCLES IN 10 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #3	BRAKE / CLUTCH	(HOLD BRAKE 3 SECONDS 5 TIMES / HOLD CLUTCH THROUGHOUT)		<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #4	DOOR	(MANUALLY OPEN AND CLOSE ENTRANCE DOOR THREE TIMES)		<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #5	HAND CONTROLS	(ENTER NAME OF CONTROL FOR EACH SEGMENT OF THIS STANDARD)			
RIGHT SIDE CONTROL #1	CONTROL NAME: <i>shift</i>	TIME: 4.95	(WHEEL TO CONTROL TO WHEEL IN 8 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
RIGHT SIDE CONTROL #2	CONTROL NAME: <i>horn</i>	TIME: 1.18	(WHEEL TO CONTROL TO WHEEL IN 8 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
LEFT SIDE CONTROL #1	CONTROL NAME: <i>brakes</i>	TIME: 1.95	(WHEEL TO CONTROL TO WHEEL IN 8 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
LEFT SIDE CONTROL #2	CONTROL NAME: <i>left depressor</i>	TIME: 2.51	(WHEEL TO CONTROL TO WHEEL IN 8 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #6	EMERGENCY EXIT	TIME: 8.30	(FROM DRIVER SEAT AND OUT EXIT IN 20 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	
STANDARD #7	WEIGHT DRAG	TIME: 7.42	(125 LBS 30 FEET IN 30 SECONDS)	<input checked="" type="checkbox"/> PASS <input type="checkbox"/> FAIL	

IN ACCORDANCE WITH THE COMMISSIONER'S REGULATION 156.3, AND GUIDELINE PT901, AND WITH KNOWLEDGE OF HIS/HER DUTIES, I CERTIFY THAT THE ABOVE NAMED DRIVER (CHECK ONE):

☒ HAS PASSED ALL 7 STANDARDS AND IS QUALIFIED BY THE PHYSICAL PERFORMANCE STANDARDS.

☐ IS NOT QUALIFIED BY THE PHYSICAL PERFORMANCE STANDARDS.

SBDI INFORMATION AND SIGNATURE

SBDI NAME (PRINTED) Koselnak, Mary B.	SBDI SIGNATURE <i>Mary B Koselnak</i>	SBDI # 98056	DATE 2-13-13
--	--	-----------------	-----------------

COPY #1 SHOULD BE PLACED IN DRIVER'S FILE. COPY #2 FOR NYSED—ATTN: JAMES DUNDON, 876 EBA, 89 WASHINGTON ST, ALBANY, NY 12234. COPY #3 GIVEN TO TESTED DRIVER. COPY #4 FOR TESTER'S RECORDS. IF A WAIVER HAS BEEN APPROVED BY NYSED, THE TESTING 19-A CERTIFIED EXAMINER MUST COMPLETE AND SIGN INFORMATION BELOW—IN ADDITION TO SUPERVISING SBDI.

19-A CE PRINT NAME	19-A CE SIGNATURE	19-A CE #	DATE
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REMARKS
EXHIBIT
Railo M
6889-163-008 (1/09)

INSTRUCTIONS TO CERTIFIED EXAMINER:

- Regular observation of a driver's defensive driving performance must be conducted while the driver is operating the vehicle with passengers.
- This observation shall NOT be conducted on the same day as the biennial behind-the-wheel road test.
- Discuss performance with driver, complete rating, driver acknowledgement, and examiner certification.

SECTION 1 - DRIVER INFORMATION							
Last Name Rallo		First Caitlin		M.I. H		Date of Birth (Month/Day/Year) 8/12/1981	
Street Address 5 White Street, Apartment 2				City Port Jervis		State NY	Zip Code 12771
Client/License ID Number (from Driver License) 491879925		State NY	Class of Driver's License B	Endorsements PS	Restrictions NONE	Expiration Date 8/12/2015	

SECTION 2 - CARRIER INFORMATION				
Carrier/DBA Name Quality Bus Service, LLC		Legal Name (if different)	Federal ID Number 260833353	19-A Business ID Number 22855
Street Address PO Box 600		City Sparrowbush	State New York	Zip Code 12780

SECTION 3 - VEHICLE INFORMATION				
Type of Vehicle School Bus	Adult Seating Capacity 44	GVWR 29000	Vehicle Plate Number 55171-BA	State NY

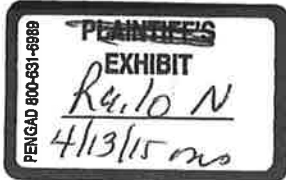
SECTION 4 - OBSERVATION (may be conducted inside or outside the vehicle)				
Observation Conducted: <input checked="" type="checkbox"/> Inside <input type="checkbox"/> Outside				
	Satisfactory	Unsatisfactory	Satisfactory	Unsatisfactory
1. Observation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	7. Obey Traffic Signs, Signals and Road Hazard Signs	<input checked="" type="checkbox"/> <input type="checkbox"/>
2. Traffic Lane Use (include center line violation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Observes Proper Following Distance	<input checked="" type="checkbox"/> <input type="checkbox"/>
3. Speed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9. Procedures for Receiving and Discharging Passengers	<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Proper Signals Intention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Traffic Interaction	<input type="checkbox"/> <input checked="" type="checkbox"/>
5. Turning	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vehicle Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Comments: (required if Unsatisfactory checked above) to much unnecessary conversation w/ students
1. Be more observant when people getting in & out of cars on side streets
9. Remind students of 4 step unloading procedure & crossing
10. When car is letting pedestrians cross you're a stop sign wait car has right of way

SECTION 5 - DRIVER ACKNOWLEDGEMENT	
I acknowledge discussion of my defensive driving performance with the examiner who observed and rated my performance.	
<u>Caitlin Rallo</u> (Driver Signature)	<u>12/3/12</u> (Date)

SECTION 6 - EXAMINER'S CERTIFICATION					
Certified Examiner's Name Mary Koselnak			Client/License ID Number (from Driver License) 681891588		
Certificate Number 070197	Certification Class B	Endorsements PS	Restrictions B	Expiration Date 8/20/2020	
I certify that the above report is, to the best of my knowledge, true and correct, that I personally observed the above driver's defensive driving performance, and that I currently hold a valid examiner certification as required in accordance with Article 19-A of the New York State Vehicle and Traffic Law.			Certified Examiner's Signature <u>Mary Koselnak</u>		

Date of Observation
12-3-12





INSTRUCTIONS TO CERTIFIED EXAMINER

- This test shall not be conducted on the same day as the annual defensive driving performance observation. The test should be taken without passengers in the vehicle.
- If the driver fails the test, he/she is disqualified from driving under Article 19-A. He/she may make a request to the carrier for a reexamination.
- Examiner will circle the point value of those items not properly performed. Driver is disqualified if 40 or more points are circled or, if a DISQUALIFICATION (DQ) item is circled, or if any two 10-point items are circled.

DRIVER INFORMATION

Driver's Last Name Railo		First Caitlin	M.I. H	Date of Birth (Month/Day/Year) 8/12/1981	
Street Address 5 White Street, Apartment 2		City Port Jervis	State NY	Zip Code 12771	
Client/License ID Number (from Driver License) 491879925	State NY	Class of Driver's License B	Endorsements PS	Restrictions NONE	Expiration Date 8/12/2015
Driver Signature <i>Caitlin Railo</i>					

CARRIER INFORMATION

Carrier/DBA Name Quality Bus Service, LLC	Legal Name (if different)	Federal ID Number 260833353	19-A Business ID Number 22855
Street Address PO Box 600	City Sparrowbush	State New York	Zip Code 12780

VEHICLE INFORMATION

Type of Vehicle School Bus	Adult Seating Capacity 44	GVWR 29000	Vehicle Plate Number 55171-BA	State NY
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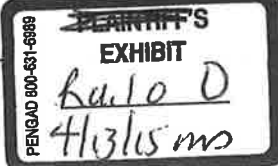
1. PRE-TRIP TEST	Point Value	EN-ROUTE (Continued)	Point Value
A. Failed to check wheels, tires	5	J. Failed to use proper speed - impedes traffic	5
B. Failed to check validation of required vehicle stickers	5	K. Failed to use proper steering control	5
C. Failed to check lights <i>Back up / Brake</i>	(5)	L. Failed to use proper braking	5
D. Failed to check windshield, wipers, horn, and steering	(5)	M. Failed to use proper acceleration	5
E. Failed to check emergency equipment: fire extinguisher, and emergency reflectors	(5)	N. Failed to use proper speed for conditions	DQ
F. Failed to check seats and restraints when equipped	(5)	O. Failed to anticipate and/or identify hazards	5
G. Failed to check passenger entry and emergency exits	5	P. Failed to yield right-of-way	DQ
H. Failed to check all gauges, heater, and defroster	5	Q. Failed to use proper lane/s	(10)
I. Failed to check all mirrors and adjust as needed	5	R. Failed to properly use transmission	5
J. Failed to perform static brake check	5	S. Failed to observe traffic control devices	DQ
K. Failed to properly use seat belt	5		
L. Failed to perform 50 ft. brake test	10		
		4. PARKING AND BACKING	
2. DEPARTING		A. Failed to leave the vehicle to check rear before backing (no observer)	10
A. Failed to signal	5	B. Failed to observe (backing)	DQ
B. Failed to observe	10	C. Unable to park	DQ
C. Failed to use caution	10	D. Failed to properly position the vehicle	5
		E. Stopped too far away from, or hit, curb	5
3. EN-ROUTE		F. Excessive maneuvers in parking	5
A. Failed to properly signal	5		
B. Failed to observe	10	5. SIMULATED PROCEDURES FOR RECEIVING/DISCHARGING PASSENGERS	
C. Failed to demonstrate proper judgment approaching/at intersection; speed, turning, stopping, observing, etc.	10	A. Failed to use caution at approaching/departing, receiving/discharging points	DQ
D. Failed to make proper lane changes; signals _____, observes _____, procedure _____	5	B. Failed to properly activate warning lights/devices (where applicable)	DQ
E. Failed to regularly check mirrors while driving	5	C. Lacked knowledge of proper crossing procedures as required by NYS Education Department (where applicable)	DQ
F. Failed to stop properly at RR crossing	DQ	D. Failed to observe pedestrians/passengers or other hazards at receiving and discharge points	DQ
G. Failed to use proper clutch/engine control	5		
H. Failed to use proper judgment in traffic	10		
I. Failed to demonstrate proper following distance	DQ		

EXAMINER'S CERTIFICATION

SCORING: Total Points Circled Above <u>30</u>	Disqualification (DQ) Circled Above <u>0</u>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	RESULTS: <input checked="" type="checkbox"/> QUALIFIED
	Two 10-point items Circled Above <u>0</u>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<input type="checkbox"/> DISQUALIFIED

CERTIFIED EXAMINER'S COMMENTS: (write or type on reverse side)

Certified Examiner's Name Mary Koselnak		Client/License ID Number (from Driver License) 681891588	
State Number 97	Certification Class B	Endorsements PS	Restrictions B
Certified Examiner's Signature <i>Mary Koselnak</i>		Expiration Date 8/20/2020	
		Date of Test 12-18-12	



PRE SERVICE COURSE
QUALITY BUS SERVICE, LLC
504 Route 42
Sparrowbush, NY 12780



Tuesday, 11/6/12

Course Instructor: Mary Koselnak

SBDI #: 98-056
NYSED PRE SERVICE COURSE 2010 CURRICULUM
Sign in sheet

Christina Roth Christina Roth

Carlini Raito Carlini Raito

Dana Keefer Dana Keefer

New York State Education Department
SCHOOL BUS DRIVER PRE-SERVICE COURSE
MANDATED UNITS 1-6
FINAL EXAM

Instructions: Circle the best answer to each question. Use a pen. Complete both sides. Turn the completed test in to your Pre-Service Course instructor.

* * *

1. Complete the following sentence: *Your main priority as a school bus driver is...*

- a. staying on schedule
- b. keeping parents happy
- ☒ c. protecting the students
- d. keeping peace with the students

2. Complete the following sentence: *To be treated as a professional, you must act like a...*

- a. buddy to your students
- b. macho man
- ☒ c. professional
- d. authority

3. Which statement about fatigue is **not** true?

- a. It is against the law to drive school bus more than ten hours in a single day.
- ☒ b. You can legally drive school bus at six a.m. if you returned from a sports trip at midnight the night before.
- c. It is against the law to be on duty for more than fifteen hours in a single day.
- d. Trying to drive a school bus when you're tired is a recipe for disaster.

4. Which of the following actions are **unacceptable** for a school bus driver?

- a. Hitting the brakes hard so students sit down.
- b. Making fun of a student's family or house.
- c. Pushing a misbehaving student into his seat.
- ☒ d. All of the above actions are unacceptable.

☒ 5. **TRUE or FALSE?** "School bus drivers in New

York State are subject to random drug and alcohol testing while on duty, as well as continuous monitoring of their driving and criminal record both on and off the job."

6. Which of the following statements are true?

- a. Children don't like an out-of-control bus any more than adults do.
- b. All children deserve a safe bus ride.
- c. Positive relationships with students are the key to safe behavior.
- ☒ d. All of the above.

☒ 7. **TRUE or FALSE?** "Squabbles over where to sit are a common cause of behavior problems."

☒ 8. **TRUE or FALSE?** "Like adults, children need to understand the 'why's' behind rules."

☒ 9. **TRUE or FALSE?** "Use referrals sparingly, for violations of key safety rules."

☒ 10. **TRUE or FALSE?** "Even if a child misbehaves, never put the child off the bus during the route."

11. What is the most dangerous piece of equipment on your bus?

- a. Fire extinguisher.
- ☒ b. Internal mirror above the driver.
- c. Bumpers.
- d. Fuel tank.

12. TRUE or FALSE? "Making fun of a child in front of others usually improves behavior."

13. Which statement about bullying is not true?

- a. Most bullying is verbal.
- ☒ b. Bullying is "just kids being kids."
- c. Sexual harassment is a form of bullying.
- ☒ d. Bullies are usually clever at what they do.

14. TRUE or FALSE? "Subs should drive even more cautiously than other drivers in the fleet."

15. Why is the student loading/unloading process considered "the moment of truth"?

- a. Three of four fatalities occur at the bus stop.
- b. Children are impulsive and unpredictable.
- c. All school buses have blind spots where a child could be hidden from direct view.
- ☒ d. All of the above.

16. Statistically, when are children most at risk?

- a. Getting on a bus in the morning.
- ☒ b. Getting off a bus in the afternoon.
- c. Riding on the bus in a residential neighborhood.
- d. Riding on the bus on the highway.

17. TRUE or FALSE? "Secure your bus at every bus stop."

18. What is the universal danger signal and what does it mean?

- a. Flash lights - child should freeze in the road.
- b. Honk horn - child should freeze in the roadway.
- c. Wave your hands and yell - child should run.
- ☒ d. Honk horn - child should immediately return to the side of the road he/she started from.

19. What's the most important purpose of crossover mirrors?

- a. To locate a child you know you've lost track of.
- ☒ b. To check for children you didn't know you'd lost track of.
- c. To check for cars pulling next to you on the road.
- d. To check your flashers during the pre-trip.

20. What should you do if you feel a bus stop is unusually hazardous, or you come up with an idea for improving safety on your route?

- a. Make the change on your own.
- ☒ b. Discuss it with your supervisor.
- c. Routes cannot be changed during the year.
- d. None of the above.

21. What's the most important reason students should stay out of the rear seats when possible?

- a. You can't hear what they're saying.
- b. Takes longer to get off the bus at their bus stops.
- ☒ c. More exposed to injury in certain accidents.
- d. Rear seats are just as safe as any other seats.

22. Which statement below is not true?

- a. Most disabled children ride regular school buses.
- b. Most bus drivers transport disabled children.
- ☒ c. Transporting children with disabilities has grown simpler in recent years.
- ☒ d. A generation ago, children with disabilities seldom had a chance to go to school.

23. Which statement(s) below are true?

- a. A child with a disability is a child, not a disability.
- b. Every child, disabled or not, is an individual with a unique personality.
- c. Within every disability category, individual children display a wide spectrum of characteristics and behaviors.
- ☒ d. All statements are true.

24. An inability to communicate and interact with others and repetitive movements such as rocking or waving is characteristic of what type of disability?

- a. Emotional disturbance.
- b. Mental retardation.
- c. ADHD.
- ☒ d. Autism.

25. Which statement is not a typical characteristic of children with emotional disturbance?

- ☒ a. Behaves normally in normal circumstances.
- b. Trouble maintaining friendships with peers.
- c. Pervasive unhappiness or depression.
- d. Physical symptoms due to personal problems.

26. ☒ TRUE or FALSE? "Unnecessarily revealing personal information about students or their families is a violation of state and federal law."

27. Which statement(s) below are true?

- a. A thoughtless comment about a child can leave a lasting scar.
- b. Sensitivity towards children with disabilities begins with an examination of how we speak.
- c. Our society has a long history of savage verbal abuse aimed at the "handicapped."
- ☒ d. All the above statements are true.

28. TRUE or FALSE? "School buses cannot catch fire."

29. TRUE or FALSE? "Always evacuate students in a school bus emergency."

30. What's the safest way to go out a rear emergency door?

- ☒ a. Sit and slide.
- b. Jump directly to the ground.
- c. Jump into someone's arms.
- d. Never go out a rear emergency door.

31. PJ's Law focuses on _____ in addition to technical skills.

- a. Background checks
- b. Seniority
- ☒ c. Sensitivity
- d. Crisis intervention

32. Which of the following is an appropriate way to communicate with a student with a disability?

- a. Storyboards
- b. Sign language
- c. Touch screens
- ☒ d. All of the above

33. When communicating with a student with a disability is recommended to:

- a. Joke about it to lighten the mood
- b. Focus on the disability and talk about it openly and often
- ☒ c. Use language of respect
- d. All of the above

34. Person – first language focuses on:

- a. *Always allowing a person with a disability to go ahead of you*
- ☒ b. *Speaking of the person first and the disability second*
- c. *Using the exact name of the disability out of respect*
- d. *All of the above*

35. PJ's Law requires school bus staff to:

- a. *Be trained annually regarding sensitivity toward the characteristics of student's disabilities*
- b. *Embrace differences in the students they transport*
- c. *Welcome students with disabilities into the broad diversity of students they transport*
- ☒ d. *All of the above*

Final Exam Score: 35

100 % of 35

School Bus Driver

PRE-
SERVICE
COURSE

Trainee Manual

CORE UNITS

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EXHIBIT

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INTRODUCTION

Welcome, new New York State school bus driver!

The *School Bus Driver Pre-Service Course* has one goal: to prepare you to safely transport children on a school bus.

You are entering a proud profession. New York State's school bus drivers have established an admirable safety record over the past generation. Statistically, New York's school buses represent the safest form of ground transportation ever devised. Children riding in school buses are approximately 24 times safer than when they're riding in the family car!

However, student safety is never assured. Your responsibility for safety will be serious from the first day you drive a bus with children on board. What you learn in this course can save a child's life.

This *Trainee Manual* will prepare you for the course. Read it carefully before the course begins. Complete the review questions at the end of each Unit before you come to class. Write down any questions you have for your instructor. If you don't understand something, say so. Asking questions is one sign of a professional.

Again, welcome to our New York State school bus safety community!

Marion Edick
New York State Education Department
2010 State Director of Pupil Transportation